

**COMMONWEALTH OF MASSACHUSETTS  
STATE BUILDING CODE  
780 CMR, 8th Edition**

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**FIRE PROTECTION SYSTEMS  
CHAPTER 9**

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***GUIDELINES FOR THE PREPARATION  
OF FIRE PROTECTION SYTEM  
NARRATIVE REPORTS***

**780 CMR – 901.2.1 Tier One Construction Documents**

## **FIRE PROTECTION SYSTEMS NARRATIVE REPORTS**

The interaction of fire protection systems can be extremely complex. The detection of a fire in a building by an automatic device may be designed to initiate other life saving fire protection systems or devices, or other mechanical systems

In some circumstances different individuals or different companies may design safety systems, which are required to interact. The narrative report is intended to provide a single document, which describes the design rationale of all fire protection systems and the interface between systems. It is an invaluable tool for building officials, fire officials, building owners and maintenance personnel.

780 CMR 901.2.1 Tier One Construction Documents requires the submission of so called fire protection systems narrative reports as part of the construction documents, which must be filed in order to obtain a building permit (or permit in part).

The following document has been developed to assist end users of the Massachusetts State Building Code in the preparation “*narrative reports*” for fire protection systems as required in 780 CMR 9 (Section 901.2.1)

**NARRATIVE REPORTS**  
**As regulated by 8<sup>th</sup> Edition, 780 CMR, Section 901.2.1**

**GENERAL**

**901.2.1.1 Fire Protection Construction Documents:**

1. a. Basis (methodology) of design for the protection of the occupancy and hazard for compliance with 780 CMR and applicable NFPA Standards, in the form of a narrative report.
- b. Sequence of operation of all fire protection systems and operation in the form of a narrative report.
- c. Testing criteria to be used for final system acceptance in the form of a Narrative report.

**DEFINITION**

A Narrative Report is a written summary description of the building or structures and all applicable fire protection systems and related operational features. Explains the analogy and methodology used by the designers in the design of the systems for the protection of the building occupants and emergency response personnel for all required and non-required fire protection systems.

**APPLICABILITY**

Required fire protection system installed in new buildings or structures, required fire protection system modification or addition to an existing system, non-required fire protection systems regulated by regulatory codes other than 780 CMR or voluntarily installed require approval, permits and inspections by building and fire department officials.

The enforcement provision of 780 CMR requires that a narrative report be submitted as part of the plan review and prior to the issuance of building permit. Administratively depending on the project size, scope and complexity, the code official should make a reasonable decision as to require a full comprehensive or partial report.

A Narrative Report for detached one and two family dwellings is not a requirement of Section 901.2.1 Tier One Construction Documents, however a limited version of the narrative Report identifying the type and style of household fire warning systems to be installed is recommended.

**PURPOSE**

Expedites the plan review and inspection process by building and fire officials. It is maintained on file for use at time of final inspection and periodic reviews during future

field inspections. Is referenced to insure that all future modifications, alterations, addition or deletion to the original systems are current and that the original system's protection and required system performance are not compromised or have been altered without building or fire official prior review.

Building owners benefit by knowing how their building's fire protection and life safety systems work and provides procedures and method for testing and maintenance. A copy of the Narrative Report should be kept on the premises and be available for review prior to testing or proposed modifications to be made to any portion of the building's life safety systems

### **DEVELOPMENT & SUBMISSION FORMAT**

Prepared by a qualified, identified individual who has "taken charge" in the development of an entire coordinated "report" which includes all information regarding the design basis, sequence of operation and testing criteria associated with all required or non-required fire protection systems set forth by applicable Laws, Regulations and Standards.

The "report" is to be submitted with plans and specifications for review and approval by code officials prior to the issuance of a building permit. The Narrative Report should be written in a clear conversational format. The installation specification is not considered a Narrative Report. The Narrative Report is a stand alone document, 8½" x 11" for filing and ease of use by code officials, including an administrative cover page identifying the project name, building address, name, address and phone number of the individual who has "taken charge" in the preparation of the Narrative Report.

### **COMMENTARY**

The promulgation of the State Building Code is written in a way to require uniformity for all buildings and structures regardless of local conditions. The intent of the codes can be subjective and interpretative by both designers and code officials; uniformity is not always necessarily achieved.

The Narrative Report attempts to clarify to the code official the designer's intent and his interpretation of the code. The code official may agree or disagree with the designer's interpretation.

Historically the requirements for fire protection systems have become site specific and building code requirements not uniformly enforced. The size of the community, fire department staffing, fire department equipment availability and suppression tactics established by the local fire department have effected the uniformity of enforcement. Site specific requirements less than or more than the building code requires may have reasonable intent; however, this type of enforcement in some cases has proven to be controversial in the applicability of code uniformity.

The Narrative Report can be a valuable instrument when accurately prepared; it will establish a line of communication between the designer and the code official resulting in

what the building code mandates, uniformity and consensus in the interpretation of the codes.

### **901.2.1 Tier One Construction Documents**

#### **(a.i.) BASIS (METHODOLOGY) OF DESIGN**

This portion of the narrative report should be broken down into the following six sections

#### **SECTION 1 901.2.1 Tier One Construction Documents - Building Description**

This section identifies specific features of a building that contributes to the overall understanding of the fire protection systems and features required to be identified in the Narrative Report

- a) Building “Use” Group
- b) Total square footage of building
- c) Building height
- d) Number of floors above grade
- e) Number of floors below grade
- f) Square footage per floor
- g) Type(s) of occupancies (hazards) within the building
- h) Type(s) of construction
- I) Hazardous material usage and storage
- j) High storage of commodities within a building usually over 12 ft.
- k) Site access arrangement for emergency response vehicles

#### **SECTION 2 - Applicable Laws, Regulations and Standards**

This section identifies regulatory codes and standards that may have an impact in the design and plan approval of the required and the non-required fire protection systems as per the requirements of 780 CMR, requiring the preparer of the Narrative Report to have had conducted a comprehensive code research

- a) 780 CMR code sections “Fire Protection System Requirements” and Edition
- b) NFPA Standards and Edition used for design of each specific fire protection system
- c) Applicability of Sections of M.G.L., Chapter 148, “Fire Prevention”
- d) Applicability of Sections of 527 CMR “Fire Prevention Regulations”
- e) Applicability of “approved” local by-laws or ordinances (*state specific ordinance*)
- f) Applicability of specialized codes (plumbing, elevator, and electrical, architectural access)
- g) Applicability of Federal Laws (OSHA, ADA, etc.)

### **SECTION 3 - Design Responsibility for Fire Protection Systems**

This section identifies the accountability for a specific fire protection system design and the accountability for the integration of the fire protection systems constituting a building life safety system.

- a) The professional engineer (PE) fully designs (complete layout and calculations) and specifies the fire protection system or systems to be installed, reviews and approves the installing contractor's shop drawings. The PE is considered the engineer of record and certifies system installation for code compliance at completion.
- b) The professional engineer (PE) provides a partial design and specifies the design criteria to be used by the installing contractor who finalizes the system layout, provides calculations to confirm the design criteria. The PE reviews and approves the installing contractor's final layout and calculations. The PE is considered the engineer of record and certifies system installation for code compliance at completion.
- c) Design-build, the installing contractor completely designs and specifies (develops a full system layout, design criteria and calculations), installs the system and certifies system installation for code compliance at completion. There may be a professional engineer involved but not necessarily.

Whichever above method is selected, the project requires an engineer of record to assume responsibility for the coordination of each specific fire protection system requiring integration, forming an entire building life safety system.

### **SECTION 4 - Fire Protection Systems to be Installed**

This section identifies key "performance design criteria" and features for each specific fire protection system

- a) Water supply, fire mains and hydrants
- b) Automatic sprinkler systems and components
- c) Standpipe systems and components
- d) Fire alarm systems and components
- e) Automatic fire extinguishing systems
- f) Manual suppression systems
- g) Smoke control/management systems
- h) Kitchen cooking equipment and exhaust systems
- I) Emergency power equipment

- j) Hazardous material monitoring equipment
- k) Seismic considerations

The description (specific features) for the above fire protection systems shall also indicate if the system is:

- Required by Regulations, Law or “approved” by-law or Ordinance
- Non-required, developer provides voluntarily
- A complete new system
- An addition or expansion to existing system
- A modification/repair to existing system
- Level of protection to be provided, 100% or partial protection or exempt by regulatory code

#### **SECTION 5 - Features Used in the Design Methodology**

This section identifies the designer’s intent in the overall design and criteria development of either a required or a non-required system.

- a) Building occupant notification and evacuation procedures
- b) Emergency response personnel, site and systems features
- c) Safeguards, fire prevention and emergency procedures during new construction and impairment plans associated with existing system modifications.
- d) Method for future testing and maintenance of systems and documentation

#### **SECTION 6 - Special Consideration and Description**

This section identifies the designer’s intent to deviate from prescriptive requirements of regulatory codes and standards with alternative methods.

- a) Application of “performance-base design” in lieu of prescriptive code requirement
- b) Interpretation/clarification between designer and code officials
- c) Waiver or variance sought through the regulatory appeal process

#### **901.2.1 Tier One Construction Documents**

##### **(1. a. ii.) SEQUENCE OF OPERATION**

This portion of the narrative report is a difficult section to write as it entails the specific operation of system devices and equipment and their related integration.

#### **SECTION 1**

- a) An operational description of either a system or specific devices within a system and the “resulting action” associated with the operation of the system or specific devices

- b) The operational description shall include all interconnected (integrated) fire protection systems and devices required or non-required forming an entire building life safety system
- c) All signage indicating equipment location, operational and design features and certified documents attesting to system installation integrity

This section of the narrative report can be brief as in a simple system such as a one story 15,000 sq.ft. mercantile building with only a sprinkler system and fire alarm notification devices. Or complex, such as in a 25 story high-rise hotel with fire pumps, emergency generator, fire alarm and sprinkler zones, automatic standpipes, automatic voice and manual evacuation signals, smoke management system, automatic elevator recall, special extinguishing systems, remote annunciation, automatic locking devices, alarm retransmission methods and emergency response procedures.

The sequence of operation of a building life safety system, particularly with complicated systems must be reviewed and understood by code officials. A team approach should be used by developers, designers, equipment suppliers, contractors including code officials to clearly describe and understand the proper operation of the integrated systems.

When a complex system is proposed, the initial narrative report of the “sequence of operation” should be viewed only as a draft. At various stages of installation modifications may be made. The designers should submit a final narrative for approval by the code officials prior to witnessing a system acceptance.

Communication between the developers and code officials is an important element particularly in this phase, as the building codes and the NFPA Standards tend to be flexible and interpretative.

### **901.2.1 Tier One Construction Documents**

#### **(1. a. iii.) TESTING CRITERIA**

This portion of the narrative report should be broken down into the following three sections

#### **SECTION 1 - Testing Criteria**

This section identifies the individual in charge who will coordinate the final acceptance testing and witnessed by appropriate code officials

##### **Personnel**

- a) Identification of professional in charge for setting up and coordinating all testing
- b) Method of verification and confirmation by professional in charge that all fire protection systems, equipment and devices have been individually tested and tested as an entire system when specific systems are integrated to form a building life safety system



- c) Method of coordination by professional in charge of all contractors, equipment distributors and code officials required to perform and witness all testing, testing dates and times, notification to public utilities, personnel required to perform all required testing as a system or individual system component testing

## **SECTION 2 - Equipment and Tools**

This section will identify the necessary equipment available on site at time of witnessing the operational features of the fire protection systems, integrated building life safety and systems that require validation from code officials to expedite the acceptance testing.

- a) Identification of equipment and procedures to be used to verify system performance

### **Example:**

Manufacturer's instructions

Specifier's special instructions

Approved Narrative Report, sequence of operation section

Smoke machines

Smoke candles

Sound meters

Fire hoses, nozzles

Flow measuring devices

Gauges

Voltage meters

Magnets

Communication radios

Fire department equipment

Special tools

Notification announcements

## **SECTION 3 - Approval Requirements**

This section identifies all the "close-out" documents for the code officials' departmental records

- a) Establish method of approval required (verbal or written) from code official if system satisfies all operational code compliance requirements
- b) Establish method of remedial action when a system or portion of a system fails to operate satisfactorily
- c) Documentation to be submitted to code officials at completion verifying that systems are in compliance with all laws, regulations and standards and pre-approved narrative reports

- d) Documentation as required by 780 CMR, Section 901.2.1
- e) Documentation to be submitted to code officials listing names, addresses and telephone number of personnel for emergency notification

## DEFINITIONS

**Fire Protection Systems** - Automatic sprinkler systems, fire detection system, fire alarm notification system, smoke control system, kitchen hood suppression system, etc.

**Building Life Safety System** - A combination of fire protection systems and other building fire protection features such as automatic door closers, emergency generators, emergency egress lighting, elevator systems, etc., interconnected or integrated with multiple fire protection systems functioning simultaneously when activated.

**Preparer of Narrative Report** - An individual who has taken charge of a project and has knowledge of required and non-required fire protection systems and buildings life safety systems. *The designer in charge of a specific design for a fire protection system may prepare their portion of the Narrative Report to be submitted to the individual who has “taken charge”. The individual who has “taken charge” shall compile the data from the designer of each system and prepare a single, comprehensive and coordinated final Narrative Report describing each system and when applicable a description of how each system interfaces with the building life safety system’s integration and sequence of operation. The take charge individual may be the architect, engineer of record, and the designer of any of the fire protection systems or an independent qualified consultant.*